

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|                                |   |                                     |
|--------------------------------|---|-------------------------------------|
|                                | : | Misc. Nos. 02-65, 02-77             |
| In the Matter of:              | : | Civil Action Nos. 02-3277, 02-1643, |
| RELIANCE GROUP HOLDINGS, INC., | : | 02-1733, 02-1774                    |
|                                | : |                                     |

**ORDER**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2004, upon consideration of the Motion for Admission of Counsel Pro Hanc Vice on behalf of Saul P. Steinberg, pursuant to Local Rule of Civil Procedure 83.5.2(b), **IT IS HEREBY ORDERED THAT:**

- (1) Said motion is **GRANTED**; and
- (2) Steven E. Obus, Esquire and Lisa A. Bauer, Esquire are admitted to practice in this Court pro hac vice for the limited purpose of representing Saul P. Steinberg in all proceedings in the above-captioned action.

BY THE COURT:

\_\_\_\_\_  
J.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|   |                  |  |
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| In the Matter of:<br>RELIANCE GROUP HOLDINGS, INC., | :<br>:<br>:<br>: | Misc. Nos. 02-65, 02-77<br>Civil Action Nos. 02-3277, 02-1643,<br>02-1733, 02-1774 |
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**MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE**

Linda J. Karpel hereby moves, on behalf of Saul P. Steinberg and pursuant to Local Rule 83.5.2(b), for the admission pro hac vice of Steven E. Obus, Esquire and Lisa A. Bauer, Esquire and, in support thereof, states the following:

1. I am an attorney with the law firm of Fried Epstein & Rettig LLP, 325 Chestnut Street, Suite 900, Philadelphia, Pennsylvania 19106. I am a counsel of record for Saul P. Steinberg in the above-captioned action.

2. I am also a member in good standing of the bar of this Court.

3. By this motion, submitted on behalf of Mr. Steinberg, I seek the admission pro hac vice of Steven E. Obus, Esquire and Lisa A. Bauer, Esquire.

4. The Declarations of Mr. Obus and Ms. Bauer are attached hereto as Exhibit "A" and incorporated in full herein.

5. Mr. Obus and Ms. Bauer are affiliated with the New York law firm of Proskauer Rose, LLP.

6. Mr. Obus and Ms. Bauer are each members in good standing of the bar of the State of New York, the bar of the United States District Court for the Southern District of New York, and the bar of the United States District Court for the Eastern District of New York.

7. In addition, Mr. Obus is a member in good standing of the bar of the United States Supreme Court, the bar of the United States Court of Appeals for the Second Circuit, and the Bar of the United States Court of Appeals for the Fourth Circuit.

8. There are no pending disciplinary actions against Mr. Obus or Ms. Bauer in any state or federal jurisdiction, nor have any such charges ever been imposed upon them.

9. Mr. Obus and Ms. Bauer represent Mr. Steinberg in matters relating to the above-captioned action. Mr. Steinberg has requested that they represent him in this action, for the purpose of appearing, arguing, and if necessary, trying this case on his behalf.

10. Mr. Steinberg engaged the Philadelphia firm of Fried Epstein & Rettig LLP, to work with Mr. Obus and Ms. Bauer in this action.

11. Mr. Obus and Ms. Bauer recognize and agree that disciplinary jurisdiction is conferred on this Court for any conduct by them arising in the course of or in the preparation of the proceedings in this matter.

12. My colleague, Lee Epstein, and I will continue to associate with Mr. Obus and Ms. Bauer as counsel for Mr. Steinberg.

13. I (as well as Mr. Epstein) will instruct Mr. Obus and Ms. Bauer in the rules, practices and procedures of this district court and continue to receive copies of all communications from the Court or opposing counsel.

14. My Declaration verifying the facts set forth in this motion is attached hereto as Exhibit "B."

WHEREFORE, Linda J. Karpel respectfully requests, on behalf of Saul P. Steinberg, that this motion be granted and that Steven E. Obus, Esquire and Lisa A. Bauer, Esquire be admitted pro hac vice for the purpose of this action.

Dated: April 14, 2004

Respectfully submitted,

LK1018

Linda J. Karpel (I.D. No. 62009)  
FRIED EPSTEIN & RETTIG LLP  
325 Chestnut Street, Suite 900  
Philadelphia, PA 19106  
Tel: (215) 625-00123  
Fax: (215) 625-0764

Counsel for Saul P. Steinberg

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| <hr/>                          | : |                                     |

**DECLARATION OF STEVEN E. OBUS  
IN SUPPORT OF HIS ADMISSION PRO HAC VICE**

I, Steven E. Obus, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner in the law firm of Proskauer Rose, LLP, located at 1585 Broadway, New York, New York 10036-8299.

2. I submit this affidavit in support of my admission pro hac vice to the bar of this Court for the purpose of representing Saul P. Steinberg in the above-captioned action.

3. I am a member in good standing of the bar of the United States Supreme Court, the bars of the United States Court of Appeals for the Second Circuit and the Fourth Circuit, and the bars of the United States District Court for the Southern District of New York and the Eastern District Of New York.

4. I am also a member in good standing of the bar of the State of New York.

5. There are no disciplinary charges pending against me in any state or federal jurisdiction, nor have any such charges ever been imposed on me in any jurisdiction.

6. I currently represent Mr. Steinberg in matters related to this action. He has requested that I represent him in this action, for the purpose of appearing, arguing, and if necessary, trying this case on his behalf.

7. In undertaking the representation of Mr. Steinberg pro hac vice, I am associated with Linda J. Karpel and Lee M. Epstein, of Fried Epstein & Rettig LLP in Philadelphia. Both Ms. Karpel and Mr. Epstein are members in good standing of the bar of this Court.

8. I recognize and agree that disciplinary jurisdiction is conferred upon this Court for any conduct by me that arises in the course of or in the preparation of the proceedings in this action.

9. In serving as pro hac vice counsel representing Mr. Steinberg, I will continue to associate with Ms. Karpel and Mr. Epstein, who will aid me by instructing me in the rules, practices, and procedures of this judicial district.

I, Steven E. Obus, declare under penalty of perjury, that the foregoing is true and correct.

Executed on April \_\_\_\_\_, 2004, in New York, New York.

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Steven E. Obus

**IN THE UNITED STATES DISTRICT COURT  
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|                                | : |                                     |

**DECLARATION OF LISA A. BAUER  
IN SUPPORT OF HER ADMISSION PRO HAC VICE**

I, Lisa A. Bauer, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am associated with the law firm of Proskauer Rose, LLP, located at 1585 Broadway, New York, New York 10036-8299.

2. I submit this affidavit in support of my admission pro hac vice to the bar of this Court for the purpose of representing Saul P. Steinberg in the above-captioned action.

3. I am a member in good standing of the bar of the State of New York. I am also a member of good standing of the bars of the United States District Court for the Southern District of New York and the United States District Court for the Eastern District Of New York.

4. There are no disciplinary charges pending against me in any state or federal jurisdiction, nor have any such charges ever been imposed on me in any jurisdiction.

5. I currently represent Mr. Steinberg in other matters related to this action. He has requested that I represent him in this action, for the purpose of appearing, arguing, and if necessary, participating in the trial of this action on his behalf.

6. In undertaking the representation of Mr. Steinberg pro hac vice, I am associated with Linda J. Karpel and Lee M. Epstein, of Fried Epstein & Rettig LLP in Philadelphia. Both Ms. Karpel and Mr. Epstein are members in good standing of the bar of this Court.

7. I recognize and agree that disciplinary jurisdiction is conferred upon this Court for any conduct by me that arises in the course of or in the preparation of the proceedings in this action.

8. In serving as pro hac vice counsel representing Mr. Steinberg, I will continue to associate with Ms. Karpel and Mr. Epstein, who will aid me by instructing me in the rules, practices, and procedures of this judicial district.

I, Lisa A. Bauer, declare under penalty of perjury, that the foregoing is true and correct.

Executed on April \_\_\_\_\_, 2004, in New York, New York.

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Lisa A. Bauer



**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|                                | : |                                     |

**DECLARATION OF LINDA J. KARPEL**

I, Linda J. Karpel, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney with the law firm of Fried Epstein & Rettig LLP, 325 Chestnut Street, Suite 900, Philadelphia, Pennsylvania 19106 and a counsel of record for Saul P. Steinberg in the above-captioned action.
2. I am also a member in good standing of the bar of this Court.
3. I have moved this Court, on behalf of Mr. Steinberg, for the admission of Steven E. Obus, Esquire and Lisa A. Bauer, Esquire as pro hac vice counsel in this action.
4. All statements set forth in the Motion for Admission Pro Hac Vice that I filed on Mr. Steinberg's behalf are true to the best of my knowledge, information and belief.

I, Linda J. Karpel, declare under penalty of perjury, that the foregoing is true and correct.

Executed on April \_\_\_\_\_, 2004, in Philadelphia, Pennsylvania

\_\_\_\_\_  
Linda J. Karpel

**THE UNITED STATES DISTRICT COURT  
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|                                | : |                                     |

**CERTIFICATE OF SERVICE**

I hereby certify that, at my direction, true and correct copies of the Motion for Admission of Counsel Pro Hac Vice, filed on behalf of Saul P. Steinberg, were served this date, by first-class mail, postage prepaid, upon counsel identified on the attached Service List.

Dated: April 14, 2004

LK101  
Linda J. Karpel

**SERVICE LIST**

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